

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
MONTGOMERY DIVISION**

**JEROME W. GRIFFIN, for  
himself and all others similarly  
situated,**

**Plaintiff,**

**V.**

**ALABAMA GAS  
CORPORATION,**

**Defendant.**

**CIVIL ACTION NO.  
2:06-cv-365-MEF**

**JOINT MOTION TO STAY**

Plaintiff Jerome Griffin and Defendant Alabama Gas Corporation, herein after “the Parties,” move this Court jointly for a stay of at least 90 days to allow them time to resolve this matter. In support of this Motion, the Parties say as follows:

1. The Parties have agreed on a basic framework to resolve this matter.

Specifically, the Parties have agreed to:

a. Enlist Hunter Hughes, Esq. of the Atlanta office of Rogers & Hardin, as a mediator;

b. Charge Mr. Hughes with selecting an expert and to instruct that expert to (1) review Alabama Gas's selection procedures for Operations Supervisor

for adverse impact and (2) if he or she finds an adverse impact in either selection procedure, to ascertain whether the selection procedure in question is job related and, if yes, whether equally effective alternative methods of selection exist that would have a lesser impact.

2. After the expert's analysis and report to Hunter Hughes, the Parties will convene for a mediation conference with Hunter Hughes to engage in discussions to resolve this matter. Currently, the Parties are finalizing a basic framework that would hopefully lead to a resolution of this matter depending on the findings of Mr. Hughes' expert.

3. The Parties believe that a stay will assist them in their efforts to resolve this matter. Although the Parties believe that a 90 day stay will be sufficient, because they do not control the schedules of Hunter Hughes or the expert he selects, the Parties ask instead that the Court allow them to provide a status report in 90 days and, if warranted based on the status report, grant them additional time as necessary to resolve this matter.

WHEREFORE, the Parties respectfully request that the Court stay this matter and order the Parties to submit a status report in 90 days.

Respectfully submitted,

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